

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IP CO., LLC,

*Plaintiff,*

v.

CELLNET TECHNOLOGY, INC.,

*Defendant.*

Civil Action No. \_\_\_\_\_

(N.D.Ga. Civil Action No. 1:05-CV-2658-CC)

**DECLARATION OF ELLIE A. DOYLE IN SUPPORT THIRD-PARTY  
LANDIS+GYR INC.'S MOTION TO QUASH SUBPOENA**

I, Ellie A. Doyle, declare that I am over twenty-one (21) years of age and am competent to make the following statements based on my personal knowledge:

1. I am Vice President and General Counsel of Landis+Gyr Inc. ("L+G"), 2800 Duncan Road, Lafayette, Indiana 47904.

2. Landis+Gyr Inc. is incorporated in the State of Delaware and its principal place of business is in Lafayette, Indiana.

3. All documents within the possession, custody, or control of L+G that might be responsive to the subpoena served on it by IP Co., LLC on December 29, 2005 are located in Indiana. None of said documents are located within the State of Delaware. Further none of said documents are under the control of any person in the State of Delaware.

4. L+G currently designs, manufactures, and distributes electricity meters that are combined with certain Cellnet RF communication devices pursuant to an

agreement dated January 8, 2004. L+G did not have products with Cellnet RF communications devices prior to January 8, 2004.

5. The documents sought by IPCO's *subpoena* contain L+G's confidential and proprietary information. Public disclosure of this information would cause substantial economic harm to L+G.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed January 23, 2005.



Ellie Doyle

**CERTIFICATE OF SERVICE**

I, Sean P. Hayes, hereby certify that on January 23, 2006, a true and correct copy of **DECLARATION OF ELLIE A. DOYLE IN SUPPORT OF THIRD-PARTY LANDIS+GYR INC.'S MOTION TO QUASH SUBPOENA** at the following addresses as indicated:

**VIA HAND DELIVERY**

Gary W. Lipkin, Esq.  
Duane Morris LLP  
1100 North Market Street  
Wilmington, DE 19801-1246

By: 

Sean P. Hayes